

**FILED**

AUG 20 2024

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOISCLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
E. ST. LOUIS OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NIRAV B. PATEL,

Defendant.

CRIMINAL NO.

Title 8, United States Code, Section 1325,  
Title 18, United States Code  
Sections 2, 1343, 1349**INDICTMENT****THE GRAND JURY CHARGES:****COUNT 1****Conspiracy to Commit Wire Fraud – 18 U.S.C. § 1349**

1. From on or about September 1, 2022, to on or about April 20, 2023, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere, defendant,

**NIRAV B. PATEL,**

knowingly conspired and agreed with others known and unknown to commit an offense against the United States, and aided and abetted the same, namely, to devise and participate in a scheme to defraud elderly victims, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for the purposes of executing the scheme, and attempting to do so, knowingly caused signals and sounds to be transmitted by means of wire communication in interstate commerce, in violation of 18 U.S.C. § 1343, and caused materials to be sent and delivered by commercial interstate carrier, in violation of 18 U.S.C. § 1341.

2. The object of this conspiracy was for PATEL and his coconspirators to obtain money and other assets belonging to elderly victims that the conspirators were not entitled to receive.

3. It was part of the conspiracy and scheme to defraud that members of the

conspiracy contacted elderly victims by email and phone and told them a fraudulent story about why they needed to send cash and other assets to the conspirators. Conspirators on the phone falsely identified themselves to victims as law enforcement, told victims that their financial information had been compromised, and told victims that they needed to send cash and other assets to fix the issue.

4. It was part of the conspiracy and scheme to defraud that the conspirators instructed victim V.L. to mail cash and other assets by United Parcel Service (UPS), an interstate carrier.

5. It was part of the conspiracy and scheme to defraud that the conspirators instructed victim V.L. to purchase \$188,000 in gold from APMEX in Oklahoma, which caused V.L. to wire money from her bank across state lines, and caused APMEX to ship gold back to V.L. by UPS. On or about November 22, 2022, Defendant PATEL then came to V.L.'s residence in Indiana to take the gold from V.L. on behalf of the conspiracy.

6. It was part of the conspiracy and scheme to defraud that the conspirators instructed victim V.L. to withdraw cash from the bank. On or about November 30, 2022, Defendant PATEL came to V.L.'s residence in Indiana to take approximately \$24,500 in cash from V.L. on behalf of the conspiracy.

7. It was part of the conspiracy and scheme to defraud that the conspirators instructed victim K.E. to withdraw cash from the bank. On or about November 23, 2022, Defendant PATEL came to K.E.'s residence in Wisconsin to take approximately \$29,000 cash from K.E. on behalf of the conspiracy.

8. It was part of the conspiracy and scheme to defraud that the conspirators again instructed victim K.E. to withdraw cash from the bank. On or about December 2, 2022, Defendant PATEL again came to Wisconsin and attempted to take cash from K.E. on behalf of

the conspiracy, but this time was stopped by law enforcement.

9. It was part of the conspiracy and scheme to defraud that the conspirators instructed victim V.B. to place cash into a bitcoin account. From on or about March 21, 2023, to on or about April 7, 2023, V.B. deposited money in a bitcoin ATM as instructed. The conspirators then took the funds from V.B.

10. It was part of the conspiracy and scheme to defraud that the conspirators instructed victim V.B. to withdraw cash from the bank, which she did by counter withdrawal and a check to cash at Busey Bank. On or about April 10, 2023, Defendant PATEL came to V.B.'s residence in Edwardsville, Illinois, and took a box containing approximately \$51,900 cash from V.B. on behalf of the conspiracy.

11. It was part of the conspiracy and scheme to defraud that the conspirators again instructed victim V.B. to withdraw cash from the bank, which she did by withdrawing money at U.S. Bank. On or about April 20, 2023, Defendant PATEL came to V.B.'s residence in Edwardsville, Illinois, and took and attempted to take a box containing cash from V.B. on behalf of the conspiracy.

12. The funds received were kept by PATEL and his coconspirators and not returned to the victims except when the funds were intercepted by law enforcement.

13. In furtherance of and as a foreseeable consequence of the conspiracy and scheme to defraud, the conspirators caused sounds and signals to be transmitted by wire in interstate commerce, in violation of Title 18, United States Code, Section 1343, and caused materials to be sent and delivered by commercial interstate carrier, in violation of Title 18, United States Code, Section 1341.

All in violation of Title 18, United States Code, Sections 2 and 1349.

**COUNT 2**  
**Wire Fraud – 18 U.S.C. § 1343**

1. Paragraphs 1-12 of Count One of this indictment are realleged here.
2. On or about November 18, 2022, in Madison County, within the Southern District of Illinois, and elsewhere, the defendant,

**NIRAV B. PATEL,**

while aiding and abetting and being aided and abetted by others known and unknown to the grand jury, for the purpose of executing the scheme to defraud described in Count One, and attempting so to do, knowingly did cause to be transmitted signals and sounds by means of wire communication in interstate commerce, namely, caused money to be wired from V.L.'s bank account at First Merchants Bank in Muncie, Indiana, to APMEX's account at BOKF NA in Tulsa, Oklahoma, sending a signal by means of wire communication in interstate commerce.

All in violation of Title 18, United States Code, Sections 2 and 1343.

**COUNT 3**  
**Wire Fraud – 18 U.S.C. § 1343**

1. Paragraphs 1-12 of Count One of this indictment are realleged here.
2. On or about April 10, 2023, in Madison County, within the Southern District of Illinois, defendant,

**NIRAV B. PATEL,**

while aiding and abetting and being aided and abetted by others known and unknown to the grand jury, for the purpose of executing the scheme to defraud described in Count One, and attempting so to do, knowingly did cause to be transmitted signals and sounds by means of wire communication in interstate commerce, namely, caused V.B. to deposit a check to cash for \$15,000 at a Busey Bank branch located within the Southern District of Illinois, sending a signal by means of wire communication in interstate commerce to servers located outside the state of Illinois.

All in violation of Title 18, United States Code, Sections 2 and 1343.

**COUNT 4**  
**Wire Fraud – 18 U.S.C. § 1343**

3. Paragraphs 1-12 of Count One of this indictment are realleged here.

4. On or about April 20, 2023, in Madison County, within the Southern District of Illinois, defendant,

**NIRAV B. PATEL,**

while aiding and abetting and being aided and abetted by others known and unknown to the grand jury, for the purpose of executing the scheme to defraud described in Count One, and attempting so to do, knowingly did cause to be transmitted signals and sounds by means of wire communication in interstate commerce, namely, caused V.B. to withdraw approximately \$35,000 at a U.S. Bank branch located within the Southern District of Illinois, sending a signal by means of wire communication in interstate commerce to servers located outside the state of Illinois.

All in violation of Title 18, United States Code, Sections 2 and 1343.

COUNT 5  
Illegal Entry – 8 U.S.C. § 1325(a)(2)

In or about January 2022, the defendant,

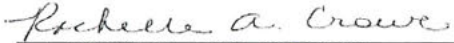
NIRAV B. PATEL,

who was then an alien, did knowingly elude examination and inspection by immigration officers but was later apprehended by law enforcement on or about April 20, 2023, in Madison County, within the Southern District of Illinois.

In violation of Title 8, United States Code, Sections 1325(a)(2) and 1329.

  
\_\_\_\_\_  
PETER T. REED  
Assistant United States Attorney



  
\_\_\_\_\_  
RACHELLE AUD CROWE  
United States Attorney

Recommended Bond: Detention